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*Attorneys for Josias N. Dewey,
Court-Appointed Temporary Receiver*

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, NORTHERN DIVISION**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**DIGITAL LICENSING INC. (d/b/a
“DEBT Box”), a Wyoming corporation;
JASON R. ANDERSON, an individual;
JACOB S. ANDERSON, an individual;
SCHAD E. BRANNON, an individual;
ROYDON B. NELSON, an individual;
JAMES E. FRANKLIN, an individual;
WESTERN OIL EXPLORATION
COMPANY, INC., a Nevada corporation;
RYAN BOWEN, an individual; IX
GLOBAL, LLC, a Utah limited liability
company; JOSEPH A. MARTINEZ, an
individual; BENJAMIN F. DANIELS, an
individual; MARK W. SCHULER, an
individual; B & B INVESTMENT
GROUP, LLC (d/b/a “CORE 1
CRYPTO”), a Utah limited liability
company; TRAVIS A. FLAHERTY, an
individual; ALTON O. PARKER, an
individual; BW HOLDINGS, LLC (d/b/a**

**MOTION TO FILE CERTAIN FIRST
AND FINAL FEE APPLICATION
EXHIBITS E, F-2, F-3, AND F-4 UNDER
SEAL**

Case No. 2:23-cv-00482-RJS

Judge Robert J. Shelby

Magistrate Judge Dustin B. Pead

the “FAIR PROJECT”), a Utah limited liability company; BRENDAN J. STANGIS, an individual; and MATTHEW D. FRITZSCHE, an individual,

Defendants,

ARCHER DRILLING, LLC, a Wyoming limited liability company; BUSINESS FUNDING SOLUTIONS, LLC, a Utah limited liability company; BLOX LENDING, LLC, a Utah limited liability company; CALMFRITZ HOLDINGS, LLC, a Utah limited liability company; CALMES & CO, INC., a Utah corporation; FLAHERTY ENTERPRISES, LLC, an Arizona limited liability company; IX VENTURES FZCO, a United Arab Emirates company; PURDY OIL, LLC, a Nebraska limited liability company; THE GOLD COLLECTIVE LLC, a Utah limited liability company; and UIU HOLDINGS, LLC, a Delaware limited liability company,

Relief Defendants.

Pursuant to Fed R. Civ. P. 26(b)(3)(A)–(B) and DUCivR 5-3, 7-1, and 26-2, Josias N. Dewey, the Court Appointed Temporary Receiver (the “Receiver”) herein, submits this Motion as well as the accompanying Proposed Order respectfully requesting leave to file **Exhibits E, F-2, F-3, and F-4** to the First and Final Fee Application under seal, namely, invoices for the Receiver and his retained professionals (“Receivership Team” and “Receivership Team Invoice Exhibits”).

Good cause exists to permit the Receivership Team Invoice Exhibits to be filed under seal to, among other things, protect attorney-client privileged and other sensitive and confidential information including attorney work product and litigation strategy that, if sought in discovery, would become subject to designation under the Court’s Standard Protective Order and attendant sealing. *See* DUCivR 26-2; DUCivR 5-3(b)(2)(C)(i).

The Receiver does not seek to seal other materials beyond the Receivership Team Invoice Exhibits, and respectfully submits that the First and Final Fee Application and other exhibits submitted therewith, apart from the Receivership Team Invoices, describe in detail the nature, scope, and substance of work performed by the Receivership Team and provide information intended to provide the Court an adequate basis to assess the reasonableness of the services provided in light of methodologies considered within the 10th Circuit, including as applicable to receivers. In submitting the Receivership Team Invoice Exhibits, the Receiver intends to provide the Court further detail and specificity relating to the work performed, in compliance with the Court's order directing the Receiver to submit the First and Final Fee Application. The Receiver respectfully reserves and does not waive the attorney-client privilege, work product, or any other protections applicable to the Receivership Team Invoice Exhibits and underlying information and materials.

CONCLUSION

Therefore, the Receiver respectfully requests that the Court permit him to submit the Receivership Team Invoice Exhibits, **Exhibits E, F-2, F-3, and F-4** to the First and Final Fee Application, under seal.

DATED this 17th day of April, 2024.

MCNEILL | VON MAACK

/s/ Jason A. McNeill

Jason A. McNeill

Eric K. Schnibbe

HOLLAND & KNIGHT

Jessica B. Magee

Andrew W. Balthazor

*Attorneys for Josias N. Dewey, Court-Appointed
Temporary Receiver*

CERTIFICATE OF SERVICE

I hereby certify that I am employed by the law firm of McNEILL VON MAACK and that pursuant to Rule 5(b), Federal Rules of Civil Procedure, a true and correct copy of the foregoing **MOTION TO FILE CERTAIN FIRST AND FINAL FEE APPLICATION EXHIBITS E, F-2, F-3, AND F-4 UNDER SEAL** was delivered to counsel of record this 17th day of April, 2024, by filing of the same through the Court's CM/ECF System.

- ☐ Hand Delivery
- ☐ Depositing the same in the U.S. Mail, postage prepaid
- ☐ Electronic Mail
- ☒ Submission to the U.S. District Court Electronic Case Filing System

/s/ Camille Coley _____